

Questions regarding this matter should be directed to me at the above noted address or telephone number.

Very truly yours,

A handwritten signature in black ink, appearing to read "Alan S. Cort". The signature is fluid and cursive, with the first name "Alan" and last name "Cort" being clearly legible, and "S." in the middle.

cc: Ms. Regina Keeney
Mr. Richard Welch
Mr. James Schlichting
Mr. Craig Brown
Mr. Jim Lichford

EXHIBIT 6

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April 14, 1997

EX PARTE

Hon. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20054

Re: NYNEX Telephone Companies
Comparably Efficient Interconnection
Plan for Payphone Services;
CC Docket No. 96-128

Dear Secretary Caton:

The undersigned is the attorney for the Independent Payphone Association of New York, Inc. (IPANY), which submitted comments to the Commission on the NYNEX CEI Plan on February 6, 1997. This letter is in response to the ex parte filing of NYNEX made on April 10, 1997.

In that filing NYNEX indicates it will federally tariff only four unbundled features and functions:

- line side answer supervision,
- direct dial screening,
- operator number screening, and
- terminating number screening.

IPANY objects to limiting a federal tariff to those four elements on the ground that New York Telephone's current New York State tariff lists many more unbundled elements and types of service.

Attached for the Commission's reference are the current version of pages 9 through 18 of Section 3 of New York Telephone's PSC No. 900 - Telephone tariff. These pages set forth the rates and regulations for Public Access Lines (ordered by independent payphone providers using "smart" pay telephones) and for "Public Access SmartLine Service", which is the "coin line" to be used by New York Telephone to connect its "dumb" pay telephones to the network.¹

The public access lines utilized by IPPs in New York are offered in four distinct

¹ Third Revised Page 9.2 describes the "coin compatible public access line" which is the "coin line" New York Telephone has offered to independent payphone providers up to this point in time. That service has been grandfathered, and will be replaced by the Public Access SmartLine Service described on page 14. As IPANY previously noted to the Commission, when the only purchaser of the "coin line" was the IPP, the price was \$31.50. Now that New York Tel's payphone division will be required to purchase the exact same service, the price has suddenly dropped to \$23.72 (IPANY Comments, February 6, 1997, at pp. 9-10).

arrangements:

- Basic Public Access Line (BPAL)
- Enhanced BPAL
- Limited InterLATA Dialing Access Line (LIDPAL)
- Enhanced LIDPAL

Those different arrangements combine various unbundled elements which should be separately tariffed, but will not be according to NYNEX's April 10, 1997 letter.

For example, the rate for the BPAL (two-way) is \$15.47. It is also possible to order a BPAL with outward call screening (OCS), for which the rate is \$17.72. The only apparent difference between these two services is the additional of OCS which is provided at an incremental price of \$2.25. Thus, OCS is in itself an unbundled service or functionality which should be separately tariffed on the federal level.

If New York Tel were to tariff OCS as an unbundled element, it is hardly likely that this Commission would approve the excessive price of \$2.25 as meeting the relevant costing and pricing standard. OCS involves simply the transmission of an extra pair of digits in the ANI or BTN stream, so that an operator service provider can be aware of when a call originates at a pay telephone. The cost of adding those two digits to the stream would be minuscule.

Both the LIDPAL and the Enhanced LIDPAL are actually a bundling of a number of

discreet services or functionality, including the blocking of "1 +" calls, OCS, international direct distance dialing (011) blocking, and blocking of certain NXX codes (generally associated with information services or pay per call lines). The only difference between the LIDPAL and the Enhanced LIDPAL appears to be the type of information service blocking which is provided.

IPANY believes each of the separate services, features and functionalities now bundled in the LIDPAL and the Enhanced LIDPAL are unbundled features and functions which should be tariffed at the federal level. Or, alternatively, because they represent a variation in features and functionalities, both the LIDPAL and the Enhanced LIDPAL should be federally tariffed.

Turning to the Public Access SmartLine Service, page 14 of the tariff shows that it also is a bundled service consisting of at least 11 separate features and functions. We believe each of those features and functions should be offered in the federal tariff on an unbundled basis.

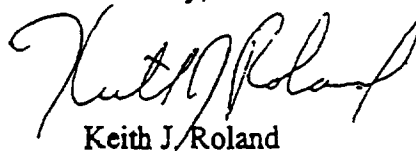
Finally, we note that one of the optional features associated with the BPAL and Enhanced BPAL is Billed Number Screening (BNS). However, it does not appear that New York Telephone is willing to tariff BNS as an unbundled element on the federal level, because it does not appear to be listed in any of the four categories on page 2 of

the April 10, 1997, letter.² No justification is given for not tariffing BNS.³

In light of the above, it is respectfully requested that New York Telephone's CEI plan not be approved by this Commission. --

Pursuant to Section 1.1206(a)(1) of the Commission's Rules, two copies of this submission are being provided for inclusion in the public record herein.

Sincerely,



Keith J. Roland

KJR/mac

Enclosure

cc: Regina Keeney
Richard Welch
James Schlichting
Craig Brown
Jim Lichford
Alan S. Cort
Albert H. Kramer, Esq.
IPANY Board of Directors

² BNS would not appear to be identical with "terminating number screening" because New York Tel indicates that this service is "not presently available" in New York.

³ The reason cannot be that there is no separate charge for BNS in the state tariff. There is no charge for Line Side Answer Supervision, either, but LSAS is tariffed on the state level.

PUBLIC TELEPHONE SERVICES

(C)

E. PUBLIC ACCESS LINES

1. General

Public Access Lines (PAL) are voice grade individual business exchange lines which provide exchange access from the subscriber's premises to the Company's central office facilities for the purpose of connecting COCOTS (as defined in E.3.a. following) to the Company's network.

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(D)

2. Types of PALs and Feature Descriptions

(C)

a. Basic Public Access Lines

(T)

Basic Public Access Lines (BPAL) are measured service lines arranged for either two way (incoming and outgoing) calling or one way (outgoing) calling.

(D)

(D)

Lines may also be arranged for Outward Call Screening where facilities permit. This feature is designed to prevent a PAL user from obtaining service through an operator when such service is billed to the calling number. An Automatic Number Identification (ANI) code is transmitted to alert operator and carrier systems that the call is originating from a Public Access Line and may require special handling and billing treatment. However, if an interexchange carrier's facilities are not compatible with the Company's signalling arrangements, directly dialed interLATA calls may be blocked by the carrier.

Incoming service on BPAL may also be equipped with Billed Number Screening. This optional feature is designed to permit operator systems to disallow incoming collect and third number calls to the BPAL line when such calls originate within the continental United States and when such calls are processed through the national data base known as Billing Validation Application (BVA).

In addition to the features described above, Enhanced BPAL blocks access to central office prefixes 394, 540, 550, 910, 920 and 970 and the service access codes 700 and 900. No other blocking options are available for Enhanced BPAL.

PUBLIC TELEPHONE SERVICES

(C)

E. PUBLIC ACCESS LINES (Cont'd)

2. Types of PALs and Feature Descriptions (Cont'd)

(C)

b. Limited Interdata Dialing Public Access Lines

(T)

Limited InterLATA Dialing Public Access Line (LIDPAL) is a class of service, where interLATA calling is limited to 0+ calling through the carrier's presubscribed operator service provider (if equipped). Casually dialed interLATA calls, where 10XXX precedes the traditional dialing pattern to identify the carrier of choice, will also be limited to 0+ interLATA calling (10XXX + 0+ area code and seven digit telephone number). LIDPAL offers PAL subscribers a vehicle for allowing interLATA 10XXX access while minimizing exposure to fraud.

This service includes Outward Call Screening, International Direct Distance Dialing (011) Blocking, and Blocking Option 4 features (see Section 2, paragraph Q.) and will be provided in equal access and adjunct equipped central offices where facilities permit. Billed Number Screening, as described in E.2.a. preceding, is an option available to LIDPAL.

(T)

As an alternative, the customer may subscribe to Enhanced LIDPAL which provides all the features of LIDPAL except that, in lieu of Blocking Option 4, it provides for blocking access to central office prefixes 394, 540, 550, 910, 920 and 970 and the service access codes 700 and 900. No other blocking options are available for Enhanced LIDPAL.

(A) Limited InterLATA Dialing (LID) is provided through business Public Access Lines to Customer Owned Coin Operated Telephones, or to other registered telephone terminal equipment when not accessed by Customer Owned Coin Operated Telephones.

(T)

(B) Limited InterLATA Dialing is provided as a one or two way measured class of service.

(T)

(C) The Limited InterLATA Dialing class of service will be provided in 1ESS/1AESS, 5ESS, and DMS100, and in 5XBAR central offices having equal access capability derived through adjunct equipment where facilities permit.

(T)

PUBLIC TELEPHONE SERVICES

(C)

E. PUBLIC ACCESS LINES (Cont'd)

2. Types of PALs and Feature Descriptions (Cont'd)

--

(C)

c. Coin Compatible Public Access Line

(T)

FURNISHED ONLY TO PRESENT SUBSCRIBERS TO THIS SERVICE ON THE SAME PREMISES. NEW INSTALLATIONS ARE NOT PERMITTED.

(N)

(N)

CCPAL service is available in 5ESS and DMS 100 central offices where facilities permit, including recording and billing capability for local band "A" call usage.

To the extent feasible, CCPAL is meant to have the same features as standard New York Telephone "Dial Tone First" (DTF) coin lines. Following is a summary of the CCPAL standard features:

(T)

(A) Two way measured service - This feature permits both outgoing and incoming service. Calls are timed and rated for initial and overtime periods according to standard New York Telephone rate schedules.

(T)

(B) Dial Tone First (DTF) - DTF enables customers to dial certain calls without requiring coin deposits, e.g. "911 Emergency Service."

(T)

(C) Outward Call Screening (OCS) - OCS transmits an Automatic Number Identification (ANI) code to alert operator and carrier systems that the call is originating from a CCPAL station and may require special handling and billing treatment.

(T)

(D) Billed Number Screening (BNS) - BNS is designed to permit operator systems to disallow incoming collect and bill to third number calls when such calls originate within the continental United States and when such calls are processed through the national data base known as Billing Validation Application (BVA).

(T)

(E) Coin Rating for CCPAL is at the standard rates for coin lines pursuant to Tariffs PSC No. 901, 902 and A2 - Telephone.

(T)

(F) Automated Local Coin Overtime (Pre-Pay) - This feature provides for standard overtime charging on band "A" calls after the initial period.

(T)

(G) Coin Signalling (Coin Collect and Coin Return) - Coin signalling is used to control the disposition of the coins held in the station. Coin collect is used when a call has been completed and coin return is used if a no answer or busy condition is encountered.

(T)

(H) Standard Recorded Announcements - Utilizes announcements regarding rating and timing of sent-paid calls.

(C)

(C)

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PUBLIC TELEPHONE SERVICES

(C)

E. PUBLIC ACCESS LINES (Cont'd)

2. Types of PALs and Feature Descriptions (Cont'd)

(C)

c. Coin Compatible Public Access Line (Cont'd)

(T)

(I) Coin Return of Initial Deposit On Cash Calls Beyond Band "A" - New York Telephone has an initial band "A" coin rate. For all calls beyond band "A" a coin return signal for the initial deposit is sent and the full initial rate is requested by a standard recorded announcement.

(T)

(J) Operator System Coin Control - New York Telephone operator system can handle 0-, 0+ and 1+ dialing from coin stations. At present, Sent-Paid InterLATA calls from CCPAL, if permitted, will be forwarded to AT&T. In the future, other carriers will be providing sent-paid interLATA service. Special billing/coin sharing arrangements between the CCPAL subscribers and their respective carriers will be necessary.

(T)

(K) DTF:coin lines include blocking of IntraLATA central office prefixes 394, 540, 550 and 970 and the 700 and 900 service access codes. The 976 central office prefix is not blocked and the Company's standard coin line band "A" rate of twenty-five cents (25¢) is charged to the coin user. The CCPAL subscriber will be billed the standard business rate for these 976 calls.

(T)

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PUBLIC TELEPHONE SERVICES

(C)

E. PUBLIC ACCESS LINES (Cont'd)

2. Types of PALs and Feature Descriptions (Cont'd)

(C)

d. Line Side Answer Supervision

(T)

Line Side Answer Supervision (LSAS) optional feature provides "off-hook" supervisory signals to customer premises equipment of the Public Telephone Service subscriber when the called party answers the call. When a called party on-hook at the end of a call is detected, the reverse battery is returned to normal indicating that the called party has disconnected from the call. The LSAS feature will permit improved accuracy of COCOT timing of sent paid calls.

(C)

(C)

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PUBLIC TELEPHONE SERVICES

(C)

E. PUBLIC ACCESS LINES (Cont'd)3. Regulations

(M)

- a. Customer-owned Coin Operated Telephones (COCOTs) are F.C.C. registered coin-activated telephone sets or coin-activated equipment provided through F.C.C. registered protective circuitry and used by any Payphone Provider. COCOTs may be connected to the Company's network only through Public Telephone Services (as defined in NOTE preceding).

(M)

(C)

- b. Customer-owned coinless and other telephones, such as credit-card reader telephones, may also be connected to PAL lines at the option of the subscriber.

(M)

- c. Coin, coinless and combination coin and coinless telephones may be connected only to PAL Individual line business message rate service.

(M)

(C)

(D)

- d. Usage rates and charges for local and toll message usage and all other regulations governing business individual access lines apply to PAL access lines.

(M)

- e. PAL subscribers are liable for all usage and monthly charges incurred on PAL access lines.

(M)

- f. PAL lines terminate in Company-provided jacks or interfaces.

(M)

- g. The Maintenance Service Charge applies as described in Section 1 of this tariff.

(M)

- h. Regulations and rates applicable to the End User Common Line charge for multiline business service as provided in Tariff F.C.C. 1 apply to PAL access lines.

(M)

(C)

- i. PAL access lines and PAL optional features are furnished subject to the availability of facilities.

(M)

- j. Other optional features for PAL access lines such as Touch-Tone and Custom Calling Services are furnished at existing tariff rates and charges for business service, subject to the availability of facilities. Custom Calling Services are not available for CCPAL.

(M)

- k. There is no charge to Customer Owned Coin Operated Telephones for local and intraLATA Directory Assistance calls.

(M)

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PUBLIC TELEPHONE SERVICES

(C)

E. PUBLIC ACCESS LINES (Cont'd)

3. Regulations (Cont'd)

- l. Public Access Line(s) (PALs) are subject to disconnection, by written order of the Public Service Commission (PSC) staff to the Company, for failure to comply with PSC's Part 650 regulations. The PSC staff will direct the Company to suspend a PAL service when a Customer Owned Coin Operated Telephone (COCOT) has been found to be in non-compliance with PSC regulations. If the violation is corrected during the period allowed by the PSC, the Company will be directed to restore service. A Service Connection Charge, a Line or Port Change Charge and a reduced monthly charge for Temporary Suspension will apply as specified in Section 14 of this tariff. If the violation has not been corrected during the prescribed period, the Company will be directed to disconnect the PAL service. During the suspension period, the Company will only install a new PAL service at the affected site for a different and unaffiliated COCOT subscriber. (T)
- m. The initial request for CCPAL in a central office entity will require a 30 day interval to establish service. Subsequent requests will be completed at normal intervals.
- n. Flexible Pricing (T)
 - (A) Public Access Line equivalent link rates may be decreased, selectively and in varying amounts, so long as the rates cover their relevant costs. (T)
 - (B) Public Access Line equivalent link rates may be increased selectively in varying amounts not to exceed 5% per year. (T)
 - (C) The Company reserves the right to change rates as described in (A) and (B) preceding at any time upon 10 days' notice to the Public Service Commission by providing a revised rate schedule and appropriate cost support. (T)
 - (D) Changes in Public Access Line rates will be effective coincident with the subscribers bill date following the effective date of the change. (T)
 - (E) A rate will not be changed unless it has been in effect for at least 30 days. (T)
 - (F) Appropriate customer notification of Public Access Line rate changes will be made. (T)
 - (G) Public Access Line rates may be changed in accordance with the provisions of (A) through (F) preceding on a wire center by wire center basis in any wire center area where a certified local exchange carrier has established a presence. (T)

PUBLIC TELEPHONE SERVICES

E. PUBLIC ACCESS LINES (Cont'd)

3. Regulations (Cont'd)

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p. Line Side Answer Supervision is not compatible with Feature Group "A" service, WATS/800 service, CCPAL, BCALs 1 and 2, DID service, or party line service. It is also not compatible with foreign exchange, remote control office and designated PBX trunks.

q. Line Side Answer Supervision is available in 5ESS and DMS-100 central offices where facilities permit.

PUBLIC TELEPHONE SERVICES

E. PUBLIC ACCESS LINES (Cont'd)

4. Rates and Charges

	<u>Monthly##</u>	<u>Non- Recurring</u>	<u>USOC</u>
Basic Public Access Lines (BPAL), each: £			
Measured	\$15.47 (10.46)	*	19Q
Measured, Originating Only	16.60 (10.46)	*	19W
Enhanced BPAL, each: £			
Measured	15.88(10.46)	*(1)	
Measured, Originating Only	16.60(10.46)	*(1)	
Basic Public Access Lines (BPAL), with Outward Call Screening (OCS), each: £			
Measured	17.72 (10.46)	*	19Z
Measured, Originating Only	18.85 (10.46)	*	1UQ
Enhanced BPAL, with OCS, each: £			
Measured	17.72(10.46)	*(1)	
Measured, Originating Only	18.85(10.46)	*(1)	
Limited InterLATA Dialing Access Line (LIDPAL) with Outward Call Screening and Blocking Option 4, each: £			
Measured	19.80 (10.46)	*	19T
Measured, Originating Only	20.93 (10.46)	*	19G
Enhanced LIDPAL, each: £			
Measured	19.80(10.46)	*(1)	
Measured, Originating Only	20.93(10.46)	*(1)	
Coin Compatible Public Access Line (CCPAL) with Call Rating, Collect and Return Signalling, Standard Recorded Announcements, OCS, BNS, etc., each: £			
Measured	31.50(15.21)	*	12E
Optional Feature, each, per line			
Billed Number Screening (BNS)	No Charge	No Charge#	
Line Side Answer Supervision, (LSAS)	No Charge	**	AS8LX

£, *, #, (1), **, ## See following page.

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PUBLIC TELEPHONE SERVICES

(C)

E. PUBLIC ACCESS LINES (Cont'd)

4. Rates and Charges (Cont'd)

(T)

The following apply to rates and charges on the preceding page:

£ The amount in parenthesis () represents the equivalent link amount that will be reduced from the full service line amount when a customer utilizes the corresponding port rate from Section 25. The full service line amount applies except in those wire centers where the Company exercises the Flexible Pricing Option. A Rate Schedule for such wire centers will be issued in accordance with Paragraph E.3.n.(C) of this Section 3.

(T)

• Service Connection Charges for business service apply, as specified in Section 14 of this tariff. Moves or additions are subject to existing tariff rates and charges for business service.

A Record Order Charge applies to the addition of the BNS feature subsequent to connection of the line.

(1) Non-recurring charges do not apply to a change from existing BPAL, BPAL with OCS or LIDPAL service to Enhanced BPAL, Enhanced BPAL with OCS or Enhanced LIDPAL service if ordered within 60 days of the effective date of this tariff revision.

** Service Charges will apply as specified in Section 14 of this tariff.

NOTE: Effective January 1, 1995, a 25¢ surcharge applies, per access line in accordance with Chapters 561 and 730 of the Laws of 1994 and pursuant to Order of the Public Service Commission dated January 23, 1995 in Case 95-C-0007.

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New York Telephone Company

Section 3

6th Revised Page 12

Superseding 5th Revised Page 12

PUBLIC TELEPHONE SERVICES

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PUBLIC TELEPHONE SERVICES

(C)

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PUBLIC TELEPHONE SERVICES

G. PUBLIC ACCESS SmartLine SERVICE

1. General

Public Access SmartLine (PASL) Service is comprised of individual measured business exchange lines with coin or coinless functionality offered to Payphone Providers (PPs) for the purpose of accessing measured services and features provided by the Company. PASLs are furnished from suitably equipped central offices, subject to the availability of facilities.

Four types of PASLs are available to PPs. Certain standard features apply to each depending on the service option selected. For details concerning the four PASL options and the standard features applicable to each, see 4. following.

2. Features

- Automated Local Coin Overtime
- Billed Number Screening (BNS)
- Blocking Service Option 4 (except intraLATA central office prefix 976)
- Coin Return of Initial Deposit on Cash Calls Beyond the Local Calling Area
- Coin Signalling (Coin Collect and Coin Return)
- Dial Tone First (DTF)
- Directory Assistance (DA)
- International Direct Dialed (011) Blocking (IDDB)
- Operator System Coin Control
- Outward Call Screening (OCS)
- Standard Recorded Announcements

(N)

3. Feature Descriptions

Automated Local Coin Overtime (Pre-Pay) - provides for standard overtime charging on local calls after the initial period.

Billed Number Screening (BNS) - permits operator systems to disallow incoming collect and bill to third number calls when such calls originate within the continental United States and when such calls are processed through the national data base known as Billing Validation Application (BVA).

Blocking Service Option 4 - see Section 2, Paragraph Q. of this tariff.

Coin Return of Initial Deposit on Cash Calls Beyond the Local Calling Area - transmits a coin return signal for the initial deposit on all calls beyond the local calling area and the full initial rate is requested by a standard recorded announcement.

Coin Signalling (Coin Collect and Coin Return) - controls the disposition of the coins held in the Basic Coin Access Line station, i.e., coin collect is used when a call has been completed and coin return is used if a no answer or busy condition is encountered.

Dial Tone First (DTF) - enables customers to dial certain calls without requiring coin deposits, e.g., "911" Emergency Service.

Directory Assistance - see Section 9, Paragraph C. of this tariff.

PUBLIC TELEPHONE SERVICES

G. PUBLIC ACCESS SmartLine SERVICE (Cont'd)

3. Feature Descriptions (Cont'd)

International Direct Dialed (011) Blocking - provides blocking of international directly dialed calls while allowing for completion of directly dialed domestic calls.

Operator System Coin Control - provides control of 0-, 0+ and 1+ dialing from BCAL stations. Sent-paid interLATA calls from BCAL 1 and 2 stations, if permitted by the Presubscribed Interexchange Carrier (PIC), will be forwarded to the customer's designated PIC.

Outward Call Screening - transmits an Automatic Number Identification (ANI) code to alert operator and carrier systems that the call is originating from a BCAL station and may require special handling and billing treatment.

Standard Recorded Announcements - utilizes announcements regarding rating and timing of sent-paid calls.

4. PASL Options

One-Way Basic Coin Access Line (BCAL 1)

BCAL 1 is a standard DTF coin line which provides only outgoing service with Blocking Service Option 4, BNS, OCS, IDDB and DA.

Two-Way Basic Coin Access Line (BCAL 2)

BCAL 2 is a standard DTF coin line which provides outgoing and incoming service with Blocking Service Option 4, BNS, OCS, IDDB and DA.

Inmate Public Access Line (Inmate)

Inmate service is a coinless line which provides only outgoing service on an operator assisted collect call basis with OCS and BNS; DA is not provided. Equal access (10XXX) dialing is not permitted.

Charge-A-Call Public Access Line (Charge-A-Call)

Charge-A-Call service is a coinless line which provides only outgoing service on an authorized credit/calling card basis with OCS, BNS and DA. One-Plus (1+) dialing (except 800 and 555) is not permitted.

5. Coin Timing and Rating Applicable to Users of Payphones Connected to BCALs 1 and 2

a. Local calls are timed and rated as follows:

Type of Call*	Initial Period or Fraction Thereof	Overtime Period or Fraction Thereof
Home Region	3	2
Region-to-Region	1	1
Band A	3	2

b. Toll calls are timed and rated based on the initial period of one minute or fraction thereof and each overtime period of one minute or fraction thereof.

* For definitions and rates, see Tariff P.S.C. Nos. 901, 902 and A2--Telephone.

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PUBLIC TELEPHONE SERVICES

G. PUBLIC ACCESS SmartLine SERVICE (Cont'd)

6. Regulations

1. Customer-owned Coin Operated Telephones (COCOTs) are F.C.C. registered coin-activated telephone sets or coin-activated equipment provided through F.C.C. registered protective circuitry and used by any Payphone Provider. COCOTs may be connected to the Company's network only through Public Telephone Services (as defined in NOTE preceding).
- a. Customer-owned coinless and other telephones, such as credit-card reader telephones, may also be connected to PASLs at the option of the subscriber.
- b. Coin, coinless and combination coin and coinless telephones may be connected only to PASL individual line business message rate service.
- c. PASL subscribers are liable for all monthly rates and usage charges incurred on PASLs.
- d. Usage rates and charges for local and toll message usage and all other regulations governing business individual access lines apply to PASLs.
- e. Regulations and rates applicable to the End User Common Line charge for multiline business service as specified in Tariff F.C.C. No. 1 apply to PASLs. (N)
- f. With Blocking Service Option 4, calls to the 976 central office prefix are permitted and standard rates will apply. The PP will be billed the standard business rate for 976 calls.
- g. PASLs terminate in Company-provided jacks or interfaces.
- h. The Maintenance Service Charge applies as specified in Section 1 of this tariff.
- i. Other optional features for PASLs such as TOUCH-TONE Calling Service, are furnished subject to the availability of facilities and at existing tariff rates and charges for business service specified in Section 6, Paragraph B.1.c. of this tariff. Custom Calling Services are not available to PASLs.
- j. There is no charge to Customer Owned Coin Operated Telephones for local and IntraLATA Directory Assistance calls.
- k. The Initial request for a PASL in a central office entity will require a 30-day interval to establish service. Subsequent requests for PASLs will be completed at normal intervals.

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PUBLIC TELEPHONE SERVICES

G. PUBLIC ACCESS SmartLine SERVICE (Cont'd)6. Regulations (Cont'd)

m. PASLs are subject to disconnection for failure to comply with the Public Service Commission's (PSC) Part 650 regulations, by written order of the PSC staff to the Company. The PSC staff will direct the Company to suspend a PASL service when a PP has been found to be in non-compliance with PSC regulations.

If the violation is corrected during the period allowed by the PSC, the Company will be directed to restore service. A Service Charge, a Line or Port Change Charge and reduced monthly charge for Temporary Suspension of service will apply as specified in Sections 14 and 15 of this tariff.

If the violation has not been corrected during the prescribed period, the Company will be directed to disconnect the PASL service. During the suspension period, the Company will only connect a new PASL service at the affected site for a different and unaffiliated PP subscriber.

n. Flexible Pricing

- (A) PASL equivalent link rates may be decreased selectively and in varying amounts so long as the rates cover their relevant costs. (N)
- (B) PASL equivalent link rates may be increased selectively and in varying amounts not to exceed 5% per year.
- (C) The Company reserves the right to change rates as described in (A) and (B) preceding at any time upon 10 days' notice to the Public Service Commission by providing a revised rate schedule and appropriate cost support.
- (D) Changes in PASL rates will be effective coincident with the subscriber's bill date following the effective date of the change.
- (E) A rate will not be changed unless it has been in effect for at least 30 days.
- (F) Appropriate customer notification of PASL rate changes will be made.
- (G) PASL rates may be changed in accordance with the provisions of (A) through (F) preceding on a wire center by wire center basis in any wire center area where a certified local exchange carrier has established a presence.

PUBLIC TELEPHONE SERVICES

G. PUBLIC ACCESS SmartLine SERVICE (Cont'd)7. Rates and Charges

	<u>Monthly Rate * #</u>	<u>Noq-Recurring Charge</u>
a. BCAL1, each <i>way</i> Measured Rate	\$24.85 (10.46)	£
b. BCAL 2, each Measured Rate	23.72 (10.46)	£
c. Inmate Service, each Measured Rate	22.93 (10.46)	£
d. Charge-A-Call Service, each Measured Rate	22.93 (10.46)	£

(N)

* Effective January 1, 1995, a 25¢ surcharge applies, per access line, in accordance with Chapter 561 and 730 of the Laws of 1994 and pursuant to Order of the Public Service Commission dated January 23, 1995 in Case 95-C-0007.

The amount in parenthesis () represents the equivalent line amount that will be reduced from the full service line amount when a customer utilizes the corresponding port rate from Section 25. The full service line amount applies except in those wire centers where the Company exercises the Flexible Pricing Option. A Rate Schedule for such wire centers will be issued in accordance with paragraph G.7. n.(C) of this section.

£ Service Connection Charges for business service apply as specified in Section 14 of this tariff. Moves or additions are subject to existing tariff rates and charges for business service.

Issued: December 31, 1996

Effective: April 1, 1997

By Sandra Dilorio Thom, General Attorney
1095 Avenue of the Americas, New York, N.Y. 10036

Certificate of Service

I hereby certify that on May 15, 1997, I caused a copy of the foregoing Consolidated Application for Review of the CEI Orders by the American Public Communications Council to be sent by first class mail, postage prepaid, to:

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